

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re:	) Case No. 16-41781-399
	) Honorable Barry S. Schermer
VINCENT JACKSON & IVEY COLEMAN,	) Chapter 7
	)
Debtors.	) <b>MOTION TO COMPEL</b>
	)
	) Hearing Date: July 13, 2016
	) Hearing Time: 2:00 p.m.

**MOTION TO COMPEL**

COMES NOW David A. Sosne, duly appointed Chapter 7 Trustee herein, and for his Motion to Compel (“Motion”), respectfully states to this Honorable Court as follows:

1. This Court has jurisdiction over the subject matter of these proceedings pursuant to 28 U.S.C. §§ 1334, 151 and 157, and Local Rule 9.01 of the United States District Court, Eastern District of Missouri.

2. This is a “core” proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (E) and (O), which the Court may hear and determine.

3. On or about March 17, 2016, Vincent Jackson and Ivey Coleman (“Debtors”) filed their Voluntary Petition for relief pursuant to Chapter 7 of the United States Bankruptcy Code (the “Petition Date”), which is presently pending in this judicial district as Case No. 16-41781-399.

4. David A. Sosne (“Trustee”) is the duly appointed and acting Chapter 7 Trustee for the Debtors’ bankruptcy estate.

5. Pursuant to 11 U.S.C. § 521, 11 U.S.C. § 542 and Rule 4002 of the Federal Rules of Bankruptcy Procedure, Debtors are obligated to cooperate with Trustee in the administration

of the estate and to surrender to Trustee all property of the estate, including assets, documents, papers, records and information relating to the property of the estate.

6. At the 341 Meeting of Creditors, and by letters dated April 22, 2016 and May 6, 2016, Trustee requested that Debtors turnover: (i) an accounting of Debtors' use of their tax refunds from receipt through the Petition Date (including dates, names, explanations and receipts); and (ii) a copy of all bank statements and/or debit card statements reflecting the various expenditures.

7. Debtors have not complied with the Trustee's requests.

8. WHEREFORE, Trustee respectfully requests that this Honorable Court enter an Order compelling the Debtors to, within seven (7) days after entry of an Order approving this Motion, turnover: (i) an accounting of Debtors' use of their tax refunds from receipt through the Petition Date (including dates, names, explanations and receipts); and (ii) a copy of all bank statements and/or debit card statements reflecting the various expenditures; and granting any other and further relief as is proper.

Respectfully Submitted,  
SUMMERS COMPTON WELLS LLC

Date: May 25, 2016

By: /s/ Brian J. LaFlamme  
Brian J. LaFlamme, #49776MO  
Attorney for Trustee  
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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via electronic filing in the CM/ECF system of the United States Bankruptcy Court for the Eastern District of Missouri to the parties requesting service by electronic filing. I hereby also certify that a copy of the foregoing was served via United States Mail, first class postage prepaid, on the date of the electronic filing of this document to those individuals and entities not requesting service by electronic filing. The individuals and entities being served electronically or by mail are:

United States Trustee  
U.S. Department of Justice  
111 S. Tenth Street, Suite 6353  
St. Louis, MO 63102

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8917 Gravois Rd  
2nd Floor  
St. Louis, MO 63123

Vincent Jackson & Ivey Coleman  
3652 Louisiana Ave  
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Saint Louis, MO 63118

Archview Auto Sales  
3601 Mississippi Ave.  
East St. Louis, IL 62206

Joe-K Used Cars  
6741 Manchester Ave.  
St. Louis, MO 63139

Orion  
c/o Recovery Management Systems  
Corporation  
25 SE 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

Date: May 25, 2016

/s/ Marquita Monroe